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10 *Attorneys for Plaintiff*
CMFG Life Insurance Company

11 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

12 CMFG LIFE INSURANCE COMPANY,

13 Plaintiff,

14 v.

15 TAVARUS DUNBAR, and KEVIN
 16 DUNBAR, JR., individually and as
 17 representative of the Estate of Kevin Dunbar
 18 Sr.,

19 Defendants.

20 Case No. Case No. 2:24-cv-01969-APG-DJA

21 **UNOPPOSED MOTION FOR EXTENSION**
OF TIME TO FILE JOINT DISCOVERY
PLAN

22 Plaintiff CMFG Life Insurance Company (“CMFG”), by and through its undersigned
 attorney, hereby moves this Honorable Court an Order extending the time for the parties to file a
 joint discovery plan. In support thereof, CMFG avers as follows:

23 1. CMFG filed its complaint with accompanying exhibits (ECF 1) in the above-
 24 captioned action on October 22, 2024.

25 2. CMFG brings claims for declaratory relief that the subject life insurance policy and
 26 AD&D certificate are void and for interpleader relief in the alternative. *See generally* ECF 1.

27 3. Defendant Tavarus Dunbar, Jr. was served on November 2, 2024.

4. Defendant Tavarus Dunbar, Jr. answered and filed counterclaims against CMFG on November 6, 2024. ECF 7.

5. Upon Tavarus Dunbar filing his answer, it appears to the parties the CM/ECF system set a deadline of December 21, 2024, to file a joint discovery plan. *Id.*

6. Defendant Kevin Dunbar, Jr. has not yet appeared in this action.¹

7. Accordingly, counsel for CMFG and defendant Tavarus Dunbar conferred and agreed it would be most efficient to file a joint discovery plan once all defendants have been served and appeared.

WHEREFORE, CMFG prays for an Order permitting the parties to file a joint discovery plan once all defendants have been served and appeared in this case.

Dated: 01/02/2025

WRIGHT, FINLAY & ZAK, LLP

/s/ Robert A. Riether

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Ava R. Giacobbo, admitted pro hac vice

Attorneys for Plaintiff CMFG Life Insurance Company

IT IS THEREFORE ORDERED that the motion (ECF No. 16) is **GRANTED**. The parties' discovery plan and scheduling order is due on or before **February 3, 2025**.

DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: 1/3/2025

¹ CMFG has attempted personal service on Defendant Kevin Dunbar, Jr. at two different addresses. CMFG has also been in contact with an attorney for Kevin Dunbar, Jr. who agreed to accept service, but then indicated he could not accept service because he was not barred in Nevada or a member of the bar for the United States District Court for the District of Nevada. Kevin Dunbar, Jr. did not sign the waiver of service forms. CMFG continues its attempts to serve Kevin Dunbar, Jr.

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that
3 I electronically served on the 2nd day of January, 2025, the foregoing **UNOPPOSED MOTION**
4 **FOR EXTENSION OF TIME TO FILE JOINT DISCOVERY PLAN** to all parties registered
5 to receive CM/ECF notification and/or by depositing a true and correct copy of the same in the U.S.
6 Mail addressed as follows:

7 Kirk T Kennedy ktkennedylaw@gmail.com
8 Ava Rae Giacobbo ava.giacobbo@faegredrinker.com; docket.general@faegredrinker.com

9 */s/ Tonya Sessions*

10 An Employee of WRIGHT, FINLAY & ZAK, LLP

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